

[Parties and Counsel Listed on Signature Pages]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

People of the State of California, et al.

v.

Meta Platforms, Inc., Instagram, LLC, Meta
Payments, Inc., Meta Platforms Technologies,
LLC

Office of the Attorney General, State of Florida,
Department of Legal Affairs

v.

Meta Platforms, Inc., Instagram, LLC.

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

4:23-cv-05448, 4:23-cv-05885.

MDL No. 3047

Case Nos.: 4:23-cv-05448-YGR

4:23-cv-05885-YGR

**STATE ATTORNEYS GENERAL'S
ADMINISTRATIVE MOTION SEEKING
LEAVE TO FILE ANNOTATED
APPENDICES OF STATE LAW**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

1 Under Civil Local Rule 7-11, the State Attorneys General (“State AGs”) submit this
2 administrative motion seeking leave to file annotated charts of the appendices (ECF 662-1) that were
3 filed by Defendant Meta Platforms, Inc. (“Meta”) along with Meta’s Reply in Support of Motion to
4 Dismiss the State AGs Complaint (ECF 662).

5 During the February 23, 2024 Case Management Conference (“CMC”), the Court heard
6 discussion from the State AGs and Meta (collectively, “Parties”) regarding the most efficient way to
7 provide the Court with the elements and requirements of the various State laws at issue. The Court
8 represented that it would be efficient for the parties to furnish appended tables of State law with the
9 Parties’ perspectives. To that end, the Court requested that the State AGs give Meta an editable version
10 of the Appendix of State Law (ECF 599-1) that was filed by the State AGs along with the Opposition to
11 Meta’s Motion to Dismiss (ECF 599). Additionally, the State AGs requested that to the extent Meta’s
12 Reply in Support would address additional state law issues, that the State AGs would be afforded the
13 opportunity to respond. The Court directed the State AGs to raise that issue after receiving the Reply.

14 Meta filed its Reply in Support of Motion to Dismiss the State AGs Complaint (ECF 662) on
15 March 1, 2024. Included with this filing was Meta’s annotation of the State AGs appendix (ECF 662-2)
16 as requested by the Court. Meta also filed eight additional appendices of State law (ECF 662-1). The
17 eight appendices are distinct and different from the State AGs appendix. While the State AGs appendix
18 was a mere recitation of portions of State consumer protection statutes, Meta’s eight new appendices
19 include statutes and case law covering a variety of issues such as materiality, the applicability of the
20 FTC Act standard, consumer transactions requirements, and restitution. Some, but not all, of the statutes
21 and cases in the appendices have been directly addressed in prior filings by the Parties. In light of the
22 Court’s interest in a state-by-state delineation of relevant law, the State AGs have prepared annotated
23 versions of the appendices submitted by Meta, for the convenience of the Court.

24 Civil Local Rule 7-11 requires that a Motion for Administrative Relief be accompanied by a
25 proposed order and by either a stipulation under Civil Local Rule 7-12 or by a declaration that explains
26 why a stipulation could not be obtained. In support of this motion, the State AGs include the declaration
27
28

1 of J. Christian Lewis, Office of the Kentucky Attorney General. Meta does not object to the State AGs
 2 filing of this motion for leave.

3 For the foregoing reasons, the State AGs request that the Court grant this administrative motion
 4 and enter an order permitting the State AGs leave to file annotated charts of State law.
 5

6 DATED: March 20, 2024

Respectfully submitted,

7 **PHILIP J. WEISER**

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ATTESTATION

I, J. Christian Lewis, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: March 20, 2024



J. CHRISTIAN LEWIS
Division Chief